

**ORIGINAL**

Direct: +1.202.626.6615  
bolcott@ssd.com

January 12, 2005

**VIA HAND DELIVERY**

**RECEIVED**

JAN 12 2005

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

**Re: Mobile Satellite Ventures Subsidiary LLC**  
***Ex Parte* Presentation**  
**IB Docket No. 01-185**  
**File No. SAT-MOD-20031118-00333 (ATC application)**  
**File No. SAT-AMD-20031118-00332 (ATC application)**  
**File No. SES-MOD-20031118-01879 (ATC application)**

No. of Copies rec'd 015  
~~List~~ ABCDE

Dear Secretary Dortch:

The Boeing Company ("Boeing"), by its counsel, herein reiterates its support for the Commission's decisions in the referenced proceedings to permit the introduction of Ancillary Terrestrial Component ("ATC") as an important complement to the Mobile Satellite Service ("MSS"). As the holder of a 2 GHz MSS license and as the world's largest satellite manufacturer, Boeing has a keen interest in decisions taken in this area. The Application for Review filed by Inmarsat Ventures, Limited ("Inmarsat"), seeks to reverse important precedents decided by the Commission.<sup>1</sup> Boeing is firmly convinced that MSS licensees at L-band and S-band need the increased flexibility afforded by recent Commission decisions to ensure that next-generation MSS systems can finally achieve the ubiquitous coverage, capacity and economies of scale needed for a valuable, truly competitive consumer service.

Until recently, MSS has been generally characterized by suitcase-sized user terminals, limited coverage, low data rates, and equipment and service prices far exceeding that offered by terrestrial wireless operators. Boeing-led developments – exemplified by the Thuraya Mobile Satellite System –

<sup>1</sup> *In the Matter of Mobile Satellite Ventures Subsidiary LLC*, Application for Review of Inmarsat Ventures Ltd., File Nos. SAT-MOD-20031118-00333, SAT-AMD-20031118-00332, and SES-MOD-20031118-01879 (filed Dec. 8, 2004) ("Application for Review").

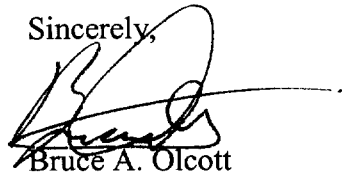
Secretary Marlene Dortch  
January 12, 2005  
Page 2

demonstrate the potential for offering MSS to a broadly dispersed user community using small handheld phones. Our evaluation of the U.S. market, taking into account the diverse requirements of both rural and urban users, indicates that ATC will be key to ensuring that the service meets the goals of competitiveness and ubiquity. This unmistakably supports the similarly-stated goals of the Commission.

Moreover, Boeing understands that the Commission includes in its goals an uncompromising support of efforts that promote effective communications for homeland security. In that regard, we note that the integration of an MSS network with ATC offers one of the best mechanisms to ensure robustness and wide-spread inter-operability necessary to meet homeland security requirements. The rules and licensing provisions adopted thus far are supportive of that goal and we encourage you not to revisit matters already adequately addressed. Furthermore, the Commission should continue to facilitate the introduction of MSS/ATC through the adoption of the improvements in its ATC rules urged by Boeing in its pending petitions for reconsideration of the rulemaking proceeding.<sup>2</sup>

This country is now at the threshold of being able to realize the full benefits of MSS technology. Boeing urges the Commission to hold the course that will permit continued introduction of innovation and better consumer service by continuing to support the MSS industry in its introduction of ATC services and by leaving unaltered the International Bureau's decision to authorize MSV's provision of MSS/ATC services.

Sincerely,



Bruce A. Olcott

Counsel for The Boeing Company

---

<sup>2</sup> See *Flexibility for Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band, the L-Band, and the 1.6/2.4 GHz Bands*, Petition for Reconsideration of The Boeing Company, FCC 03-162 (Sept. 11, 2003) (urging the Commission to reconsider some of the changes in the ATC application procedures that were adopted by the Commission in its July 3, 2003 Order on Reconsideration); *Flexibility for Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band, the L-Band, and the 1.6/2.4 GHz Bands*, Petition for Reconsideration of The Boeing Company, FCC 03-162 (July 7, 2003) (requesting the Commission to harmonize its geographic cover requirements for MSS networks providing ATC services).